

May 22, 2007

Federal Election Commission  
Reports Analysis Division  
Attn: Marlene R. Daughtrey  
999 E Street, NW  
Washington, DC 20463

ID# C00053553  
RE: Amended October Monthly Report (09/01/08-09/30/08)

Dear Ms. Daughtrey:

This letter is in response to your letter dated April 29, 2009 regarding the NRA Political Victory Fund's amended October Monthly Report (09/01/08 - 09/30/08) notifying us of a failure to file 48 hour reports. The letter also questioned an expenditure listed as Prepay Media that is shown on Schedule B, Line 21.

The Prepay Media expenditure of \$946,809.00 dated September 4, 2008, is prepayment of multiple newspapers ads that we ran just before the General Election in November. This expenditure was moved from Schedule B, Line 21 to Schedule B, Line 29 (\$18,116.00) and Schedule E (\$928,693.00) and fully itemized on October 28, 2008. Dissemination of the newspaper ads began in various markets on October 28, 2009 with most of the ads (totaling \$625,279.00) running Election Day, November 4, 2008, outside of the 24 Hour Notice Period.

In your letter, there was a spreadsheet that showed entries pulled from Schedule E. These disbursements were prepayments that were fully itemized during the reporting period that they were paid. Most of the independent expenditures listed were disseminated in a later reporting period. Attached is that spreadsheet with two additional columns listing the 24 /48 Reported amount and the disclosure date. There needs to be some clarification with some disbursements.

The disbursement reported for Barack Obama on 09/08/2008 for Consulting Fees, should have been reported on Line 21 with no allocation to any candidate. An amended October Monthly Report will be filed to reflect this correction.

The Newspaper Ad disbursement reported for Barack Obama on 09/09/2008 in the amount of \$35,204.00 was not disseminated until 11/03/2008. This dissemination fell outside of the independent expenditures 24 Hour notice period and a 24 Hour Report was not filed.

The Radio Ad allocated to Senator Norm Coleman and Al Franken in the amount of \$49,000.00 each on 09/26/2008, was disseminated two weeks later with the addition of another candidate. The 48 Hour Report filed 10/10/2008 reflects the correct allocation of \$24,500.00 for the two candidates named. An amended October Monthly Report will be filed to add the additional candidate to the radio air time purchase.

I can be reached at 703-267-1155 should you have any additional questions.

Sincerely,

\*\*\*\*\*